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August 7, 2019

Clerk,  
Hon. Daniel J. Stewart  
James T. Foley US Courthouse  
445 Broadway  
4<sup>th</sup> Floor, Rm 409  
Albany NY 12207

Re: J&J Sports Productions v Robert J Taaffe, et al  
Our File #2217158  
Case # 1:18-cv-0491(TJM/DJS)

Dear Sir/Madam:

Our firm is counsel to J&J Sports Productions, Inc., Plaintiff with respect to the above referenced matter.

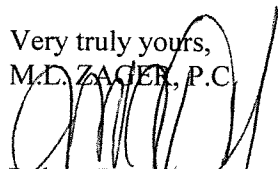
I write to request pre-motion conference with respect to Defendants' failure to comply with discovery demands. Defendants have failed to respond to any discovery demands previously served by Plaintiff.

On July 17, 2018, Plaintiff served its First Request for Production of Documents, Plaintiff's First Request for Admissions and Plaintiff's First Set of Special Interrogatories. To date, Defendants have failed to respond to any of Plaintiff's discovery demands. This despite Plaintiff's oral and written communications with Defendants' counsel.

It is respectfully requested therefore that this court schedule a pre-motion conference so that Plaintiff may file a motion with respect to defendant failure to comply with discovery demands.

Respectfully submitted.

Very truly yours,  
M.L. ZAGER, P.C.

  
Robert B. Hunter, Esq.

RH/jm

cc: Clemente J. Parente  
Jackson Lewis P.C. - Albany Office  
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